MS WORD Secretary

Federal Communications Commission

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The Maritime Information Service of North America (MISNA) is a national non-profit organization of Marine Exchanges located throughout north America who share the common interest of safe, secure, environmentally responsible and efficient use of our nations ports and waterways. The main purpose of Marine Exchanges for over the past 100 plus years has been the collection and dissemination of information concerning ship movements to the maritime industry including US government agencies and Pilotage groups.

The following comments by the MISNA are in response to WT Docket 04-257, released by the Commission on July 30, 2004.

It is the position of MISNA that the land mobile use of the VPC frequencies in areas near navigable waters be restricted to use of equipment type accepted under part 80 to prevent potential interference with vessels operating at sea and in Canadian waters adjacent to the State of Washington.

We agree with the Commission that the VPC frequencies should not be reallocated or any action taken to remove this spectrum from the maritime community. Any such action would jeopardize the maritime community's ability to meet its needed operational, safety and security communications.F

MISNA supports the Commission's position to allow the use of VPC frequencies for port operation use on both a simplex and duplex basis.

Consideration should also be given to the use of the VPC frequencies for port and port facility security communications.

Sincerely,